

EXHIBIT Q

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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

WILLIAM M. BYRD,)
Plaintiff,)
)
v.) C.A. 04-11032-DPW
)
AVENTIS PHARMACEUTICALS, INC.)
and DEBRA EDMUNDS,)
Defendants.)

DEPOSITION OF **DEBORAH A. EDMUNDS**, a
Witness called on behalf of the Plaintiff, taken
pursuant to the applicable provisions of the
Federal Rules of Civil Procedure, before Maureen
Nashawaty, a Notary Public within and for the
Commonwealth of Massachusetts, held at the
offices of Flavin & Koslowsky, 424 Adams Street,
Milton, MA, on Tuesday, October 26, 2004,
commencing at 10:10 a.m.

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DISK ENCLOSED

C O N F I D E N T I A L T E S T I M O N Y 72

1 Byrd was terminated?

2 A. Somewhat.

3 Q. Do you recall who made the decision to
4 terminate Bill Byrd?

5 A. It was a mutual decision.

6 Q. Who was involved in the decision?

7 A. Christine List, Mailet Minassian and
8 myself.

9 Q. Who was the first to recommend
10 termination of Bill Byrd?

11 A. It was a mutual decision really.

12 Q. Are you saying all three of you had the
13 thought at the same time?

14 A. No. We don't have the thought at the
15 same time but we all recognized that there were
16 competencies that we tried to work with Bill to
17 get better on and they never improved or they
18 didn't improve to the standard that we needed.

19 Q. When did you recognize this?

20 A. I don't know what date.

21 Q. Approximately?

22 A. I believe the beginning of the process
23 to the end of the process was about a year
24 and-a-half.

1 Bill Byrd?

2 MS. ACKERSTEIN: Objection.

3 A. It was on the written warning -- on the
4 final written warning.

5 Q. But that is a basis for your
6 termination, is that correct?

7 MS. ACKERSTEIN: Objection.

8 A. No, it is a combination of him not
9 following through consistently on all of these
10 areas including expense reports violations as
11 well.

12 Q. I understand that.

13 So what I am getting at, I am trying to
14 find out it is my understanding that you were
15 involved in the decision to termination Bill
16 Byrd, is that correct?

17 A. Correct.

18 Q. And I am trying to find out what the
19 basis of that decision was?

20 A. Lack of meeting these performances that
21 were written out on the written warning.

22 Q. All right. So these were the bases of
23 your terminating Bill Byrd, is that correct?

24 MS. ACKERSTEIN: Objection.

1 Q. Now I want to jump to actually the
2 final written warning.

3 You put in here and I think one of the
4 reasons that you stated for his termination was
5 that you learned that Bill Byrd recently exceeded
6 Aventis entertainment expense guidelines?

7 MS. ACKERSTEIN: Objection.

8 Q. As well as recording the expenses
9 inaccurate, is that true?

10 MS. ACKERSTEIN: Objection.

11 A. It was a combination of everything in
12 this final written warning.

13 Q. Is that one of the reasons for the
14 termination?

15 MS. ACKERSTEIN: Objection.

16 A. Expense guidelines?

17 Q. Yes.

18 A. If I recall correctly, yes.

19 Q. Can you identify for me what
20 specifically you are talking about in this final
21 written warning?

22 A. I believe it was the golf outing.

23 Q. When you say the golf outing, what do
24 you mean by that?

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1 receipt is. Can you see the copy? Stop & Shop
2 it says.

3 Do you see a date on this receipt, the
4 last page?

5 MR. KOSLOWSKY: I don't see it but
6 this is the document that Aventis produced in
7 response to a Request for a Production of
8 Documents.

9 A. It appears to be this receipt for the
10 \$125.90 I assume is going towards the June 6th
11 Stop & Shop round table.

12 Q. Is that an error? Are you trying to
13 say --

14 A. Where does \$140.44 come from if the
15 receipt says \$125.90?

16 Q. So as I understand it, one of the
17 reasons that you terminated Mr. Byrd was because
18 of this expense report, is that correct?

19 A. Falsifying expense report and call
20 activity.

21 Q. You believe that he falsified this
22 expense report?

23 A. Let me look at it.

24 On the first page of the receipts, the

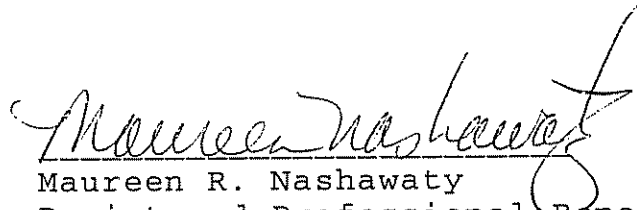
C E R T I F I C A T E

COMMONWEALTH OF MASSACHUSETTS

Norfolk, ss.

I, Maureen Nashawaty, a Registered Professional Reporter and Notary Public in and for the Commonwealth of Massachusetts, do hereby certify that the foregoing transcript of the deposition of **DEBORAH A. EDMUNDS**, having been duly sworn, on Tuesday, October 26, 2004, is true and accurate to the best of my knowledge, skill and ability.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 11th day of November, 2004.


Maureen R. Nashawaty
Registered Professional Reporter

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EXHIBIT R

PHARMACEUTICAL SALES REPRESENTATIVE

Job Title: Pharmaceutical Sales Representative
Group: PCP 1-6
Department: Primary Care
Division: US Commercial Sales
Location:
Grade Level: 20 – 35 Dependent upon experience
Manager:
Class: Exempt
Travel: 50-80%
Posting Closes:

Job Duties:

This position will report to the Area Manager and is responsible for creating demand sales through the implementation and execution of national Aventis Pharmaceuticals sales strategies on a local level. PC Sales Representatives identify key influencers in the customer environment and interface with customers to present product features and benefits. Sales Representatives understand and address both business and scientific oriented needs.

Education & Training Requirements:

- Four year college degree required
- One – Two years successful sales experience preferred
- Aptitude for learning technical and scientific product-related information
- Valid drivers license

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